## UNITED STATES DISTRICT COURT FOR THE Northern District of Illinois Western Division

Victoria C. McKenzie	)	
	)	
v.	)	Case No. 3:20-cv-50249
Plaintiff,	)	
	)	Hon. Phillips G. Reinhard
Illinois Department of Children and Family	)	
Services, et al.	)	
Defendants.	)	
	)	

## **STATUS REPORT**

Now comes attorney for Plaintiff, Victoria C. McKenzie, with a status report per the Honorable Lisa A. Jensen's Minute Order #22 and states:

- 1. On July 6, 2020, Plaintiff Victoria C. McKenzie filed her Complaint in this Court along with leave to proceed *in forma pauperis*.
- 2. On July 9, 2020, Judge Reinhard struck Plaintiff's Complaint for failure to meet pleading requirements of Fed. R. Civ. P. 8(a)(2) and failure to state a claim on which relief maybe granted.
- 3. On. September 15, 2020 Plaintiff filed an Amended Complaint and a Motion for attorney representation, which the Court granted.
- 4. On September 16, 2020, the Honorable Lisa A. Jensen appointed Matthew S. Jarka to represent Plaintiff under Local Rules 83.11(h) and 83.37, and instructed counsel to file an appearance and status report informing the Court if counsel planned on filing an Amended Complaint or a statement that he cannot amend the Complaint consistent with his obligations under Rule 11 of the Federal Rules of Civil Procedure.
- 5. On November 23, 2020, the Court granted an extension until February 22, 2021 for Counsel to file a status report indicating whether he plans to file an Amended Complaint or a statement that he cannot amend the Complaint consistent with his rules under Rule 11.
- 6. Counsel has continued to communicate with the Plaintiff who has stated that her disability leaves her unable to remember the dates, names, and events on which she broadly based her originally filed Complaint in this matter.

- 7. Plaintiff also states her disability leaves her unable to communicate with Counsel by telephone which has made it difficult to assist Plaintiff to Amend her Complaint.
- 8. Counsel has been unsuccessful so far in obtaining any Illinois Department of Children and Family Services records, the specifics of which are needed to formulate the Amended Complaint.
- 9. Counsel would like to continue to provide his due diligence to the Plaintiff and this Court and requests an extension of sixty days in order to attempt to meet with Plaintiff in person to assist in Amending the Complaint.
- 10. Counsel's request for extension is not made for purposes of delay, but rather to be able to fulfill the responsibilities of the Court's appointment.

WHEREFORE, Plaintiff submits this Status Report and request for extension.

Respectfully submitted,

/s/Matthew S. Jarka
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